

ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff.

CRIM. NO. 06-20470
HON. BERNARD A. FRIEDMAN

V.

D-1 ANTHONY VIRAMONTEZ,
D-2 AMANDA CURRY,
D-3 DONNA LYNN ALEXANDER,
D-4 DOMINIC DELVERO,
D-5 KENNETH PHILLIPS,
D-6 MICHAEL FLORES,
D-8 ANGEL GARZA,
D-9 ARTURO FLORES
D-10 KAREEM CHARTHAND
D-11 DANNY HANNA
D-12 KEVIN BLANCHETTE
D-13 KEVIN HARDWICK
D-14 SALVADOR CAMERENA
D-15 JEFFREY KAHL
D-16 ANGEL RODRIGUEZ
D-17 MOHAMMAD KHAN,
D-18 DEANNA OMEY-WARMAN,
Defendants.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

FILED

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COUNT ONE

(21 U.S.C. §846 - CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE
AND DISTRIBUTION OF, COCAINE)

1. That from 2005 to the present, in the Eastern District of Michigan and elsewhere, defendants ANTHONY VIRAMONTEZ, AMANDA CURRY, DONNA LYNN ALEXANDER, DOMINIC DELVERO, KENNETH PHILLIPS, MICHAEL FLORES, ANGEL GARZA, ARTURO FLORES, KAREEM CHARTHAND, DANNY HANNA, KEVIN BLANCHETTE, KEVIN HARDWICK, SALVADOR CAMERENA, JEFFREY KAHL, ANGEL RODRIGUEZ, MOHAMMAD KHAN, and DEANNA OMEY-WARMAN, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with each other, and with other persons whose names are both known and unknown to the Grand Jury, to commit offenses against the United States, that is, to possess with intent to distribute, and distribution of, cocaine, contrary to the provisions of Section 841(a)(1) of Title 21, United States Code; all in violation of Title 21, United States Code, Section 846.

It was part of the unlawful conspiracy that:

1. Defendant ANTHONY VIRAMONTEZ formed a large narcotics distribution organization in Detroit, Michigan. The objectives of the VIRAMONTEZ organization included the purchase and distribution of large quantities of narcotics, as well as the acquisition of monies and properties derived from the profits of his organization.

2. Defendant ANTHONY VIRAMONTEZ supplied cocaine to various

individuals in the Metropolitan Detroit area, to include, defendants KEVIN BLANCHETTE, KEVIN HARDWICK, SALVADOR CAMERENA, JEFFREY KAHL, ANGEL RODRIGUEZ, and MOHAMMAD KHAN

3. Defendant ANTHONY VIRAMONTEZ utilized the services of various individuals, to include defendants AMANDA CURRY, DONNA LYNN ALEXANDER, DOMINIC DELVERO, KENNETH PHILLIPS, MICHAEL FLORES, ANGEL GARZA, ARTURO FLORES, and DEANNA OMEY-WARMAN who acted as runners, assisted him in the sale of narcotics, kept storehouses for him, and performed a variety of other functions for him.

4. Defendant ANTHONY VIRAMONTEZ used defendant Danny Hanna to convert drug money into larger denominations to avoid detection by law enforcement.

5. Defendant ANTHONY VIRAMONTEZ used defendants AMANDA CURRY AND KAREEM CHARHAND to collect money from individuals for prior sales of cocaine.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

(21 U.S.C. §848 - CONTINUING CRIMINAL ENTERPRISE)

D-1 ANTHONY VIRAMONTEZ

That from 2005 to the present, in the Eastern District of Michigan and elsewhere, defendant ANTHONY VIRAMONTEZ did knowingly, unlawfully, and intentionally engage in a Continuing Criminal Enterprise, in that he violated Title 21,

United States Code, Sections 841(a)(1) and 846 as charged in Count One of this superseding indictment, which violations were part of a continuing series of violations undertaken by said defendant in concert with at least five other persons, with respect to whom defendant ANTHONY VIRAMONTEZ occupied a position of organizer, supervisor, and manager, and from which defendant ANTHONY VIRAMONTEZ obtained substantial income and resources to which the United States is entitled for forfeiture, including all profits obtained by ANTHONY VIRAMONTEZ arising from his participation in this enterprise, and any of his interest, property, and contractual rights, of any kind, affording a source of influence over this enterprise; all in violation of Title 21, United States Code, Section 848.

COUNT THREE

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ

D-2 AMANDA CURRY

On or about October 28, 2005, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and AMANDA CURRY did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ

D-3 DONNA LYNN ALEXANDER

On or about November 22, 2005, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and DONNA LYNN ALEXANDER did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ

D-4 DOMINIC DELVERO

On or about January 20, 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and DOMINIC DELVERO did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ

D-5 KENNETH PHILLIPS

On or about March 16, 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and KENNETH PHILLIPS did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled

substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ

D-6 MICHAEL FLORES

On or about April 19, 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and MICHAEL FLORES did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

(21 U.S.C. §841(a)(1) - POSSESSION WITH
INTENT TO DISTRIBUTE COCAINE)

D-6 MICHAEL FLORES

D-18 DEANNA OMEY-WARMAN

On or about April 19, 2006, in the Eastern District of Michigan, Southern Division, defendant MICHAEL FLORES, aided and abetted by defendant DEANNA OMEY-WARMAN, did knowingly, intentionally, and unlawfully possess, with the intent to distribute, cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ
D-8 ANGEL GARZA

On or about September 8, 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and ANGEL GARZA did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ
D-9 ARTURO FLORES

On or about July 24, 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and ARTURO FLORES did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ
D-9 ARTURO FLORES

On or about August 16, 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and ARTURO FLORES did

knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE
(21 U.S.C. §841(a)(1) - POSSESSION WITH
INTENT TO DISTRIBUTE COCAINE)

D-1 ANTHONY VIRAMONTEZ
D-12 KEVIN BLANCHETTE
D-14 SALVADOR CAMERENA

During January 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ, KEVIN BLANCHETTE, and SALVADOR CAMERENA did knowingly, intentionally, and unlawfully possess, with the intent to distribute, cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN
(21 U.S.C. §841(a)(1) - POSSESSION WITH
INTENT TO DISTRIBUTE COCAINE)

D-1 ANTHONY VIRAMONTEZ
D-13 KEVIN HARDWICK

During January 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and KEVIN HARDWICK did knowingly, intentionally, and unlawfully possess, with the intent to distribute, cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOURTEEN

(21 U.S.C. §841(a)(1) - POSSESSION WITH
INTENT TO DISTRIBUTE COCAINE)

D-1 ANTHONY VIRAMONTEZ

D-15 JEFFREY KAHL

During April 2006, in the Eastern District of Michigan, Southern Division, defendants ANTHONY VIRAMONTEZ and JEFFREY KAHL did knowingly, intentionally, and unlawfully possess, with the intent to distribute, cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTEEN

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-1 ANTHONY VIRAMONTEZ

During July 2006, in the Eastern District of Michigan, Southern Division, defendant ANTHONY VIRAMONTEZ did knowingly, intentionally, and unlawfully distribute cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN

(21 U.S.C. §841(a)(1) - DISTRIBUTION OF COCAINE)

D-16 ANGEL RODRIGUEZ

D-17 MOHAMMAD KHAN


During July 2006, in the Eastern District of Michigan, Southern Division, defendants ANGEL RODRIGUEZ, and MOHAMMAD KHAN did knowingly,

intentionally, and unlawfully possess, with the intent to distribute, cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

THIS IS A TRUE BILL.


GRAND JURY FOREPERSON

STEPHEN J. MURPHY
United States Attorney


DIANE L. MARION
Assistant U.S. Attorney

Dated: 3-7-07

ORIGINAL
United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

Case Number 06-20470

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information

Companion Case Number:

This may be a companion case based upon LCrR 57.10 (b)(4)¹:

Judge Assigned:

[] Yes [X] No

AUSA's Initials:

Case Title: USA v. ANTHONY VIRAMONTEZ, et al.County where offense occurred : WAYNECheck One: ☒ Felony☐ Misdemeanor☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]☒ Superseding Indictment --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information:**Superseding to Case No: 06-20470Judge: BERNARD A. FRIEDMAN

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges**

D-8 ANGEL GARZA,	21 U.S.C. 841 (a)(1) and 846
D-9 ARTURO FLORES,	21 U.S.C. 841 (a)(1) and 846
D-10 KAREEM CHARHAND,	21 U.S.C. 841 (a)(1) and 846
D-11 DANNY HANNA,	21 U.S.C. 841 (a)(1) and 846
D-12 KEVIN BLANCHETTE,	21 U.S.C. 841 (a)(1) and 846
D-13 KEVIN HARDWICK,	21 U.S.C. 841 (a)(1) and 846
D-14 SALVADOR CAMERENA,	21 U.S.C. 841 (a)(1) and 846
D-15 JEFFREY KAHL,	21 U.S.C. 841 (a)(1) and 846
D-16 ANGEL RODRIGUEZ,	21 U.S.C. 841 (a)(1) and 846
D-17 MOHAMMAD KHAN,	21 U.S.C. 841 (a)(1) and 846
D-18 DEANNA OMEY-WARMAN,	21 U.S.C. 841 (a)(1) and 846

MAR 8 2007

FILED

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 7, 2007

Date



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